

EXHIBIT D



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April 2, 2013

VIA EMAIL and U.S. MAIL

Mr. Eric T. Stach
Del Galdo Law Group, LLC
1441 South Harlem Avenue
Berwyn, IL 60402
stach@dlglawgroup.com

Re: Dr. Jane Montes v. Cicero Public School District 99, et al.

Dear Eric:

In the past, you indicated that Defendants are in the possession of thousands of pages of electronic records. To assist in the efficient production of relevant electronic records, we agreed to provide you search terms. Below please find a list of proposed search terms. To the extent that these search terms produce voluminous electronic records, please contact me with the details of the results so that we may narrow the field.

Unless otherwise indicated, the search of Defendants' electronic records should cover the time period of July 1, 2008 through the present. Plaintiff requests that the following search of electronic records be conducted:

- 1) All electronic communications sent to and received by Karen Mulattieri from January 1, 2010 through January 13, 2011 that contain any of the following terms:
 - a) discrimination;
 - b) ELL;
 - c) ESL;
 - d) REACH;
 - e) evaluation;
 - f) review;
 - g) Jane Montes;
 - h) Title III;
 - i) grant;



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- j) bilingual;
- k) performance;
- l) TRA;
- m) technical resource advisors;
- n) data;
- o) rating;
- p) goals;
- q) contract;
- r) supervisor;
- s) supervise;
- t) plan;
- u) resign;
- v) resignation;
- w) procedures handbook;
- x) Grant Director;
- y) Director of ELL;
- z) data analysis;
- aa) data entry;
- bb) data reporting;
- cc) supervision of ELL program;
- dd) supervision of ESL program; and
- ee) Jane Montes' work performance.

2) All electronic communications sent to and received by Donna Adamic that contain any of the following terms

- a) discrimination;
- b) ELL;
- c) ESL;
- d) REACH;
- e) evaluation;
- f) review;
- g) Jane Montes;
- h) Title III;
- i) grant;
- j) bilingual;
- k) performance;
- l) TRA;
- m) technical resource advisors;
- n) data;
- o) rating;
- p) goals;
- q) contract;
- r) supervisor;



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- s) supervise;
 - t) plan;
 - u) resign;
 - v) resignation;
 - w) procedures handbook;
 - x) Grant Director;
 - y) Director of ELL;
 - z) Karen Mulattieri;
 - aa) data analysis;
 - bb) data entry;
 - cc) data reporting;
 - dd) supervision of ELL program;
 - ee) supervision of ESL program; and
 - ff) Jane Montes' work performance.
- 3) All electronic communications sent to and received by Mike Dziallo that contain any of the following terms:
- a) discrimination;
 - b) ELL;
 - c) ESL;
 - d) REACH;
 - e) evaluation;
 - f) review;
 - g) Jane Montes;
 - h) Title III;
 - i) grant;
 - j) bilingual;
 - k) performance;
 - l) TRA;
 - m) technical resource advisors;
 - n) data;
 - o) rating;
 - p) goals;
 - q) contract;
 - r) supervisor;
 - s) supervise;
 - t) plan;
 - u) resign;
 - v) resignation;
 - w) procedures handbook;
 - x) Grant Director;
 - y) Director of ELL;
 - z) Karen Mulattieri;



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- aa) data analysis;
- bb) data entry;
- cc) data reporting;
- dd) supervision of ELL program;
- ee) supervision of ESL program; and
- ff) Jane Montes' work performance.

4) All electronic communications sent to and received by Jane Montes that contain any of the following terms:

- a) discrimination;
- b) ELL;
- c) ESL;
- d) REACH;
- e) evaluation;
- f) review;
- g) Jane Montes;
- h) Title III;
- i) grant;
- j) bilingual;
- k) performance;
- l) TRA;
- m) technical resource advisors;
- n) data;
- o) rating;
- p) goals;
- q) contract;
- r) supervisor;
- s) supervise;
- t) plan;
- u) resign;
- v) resignation;
- w) procedures handbook;
- x) Grant Director;
- y) Director of ELL;
- z) Karen Mulattieri;
- aa) data analysis;
- bb) data entry;
- cc) data reporting;
- dd) supervision of ELL program;
- ee) supervision of ESL program; and
- ff) Jane Montes' work performance.

5) All electronic communications between Donna Adamic and Jane Montes.



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- 6) All electronic communications between Mike Dziallo and Jane Montes.
- 7) All electronic communications between Karen Mulattieri and Jane Montes.
- 8) All electronic communications between Donna Adamic or Mike Dziallo, on the one hand, and any member of the Board for Cicero Public School District 99, on the other hand, from January 1, 2010 through December 31, 2011.
- 9) All electronic communications regarding, sent to or received by Ilyse Leland that contain any of the following terms:
 - a) qualification;
 - b) credentials;
 - c) experience;
 - d) training;
 - e) performance;
 - f) evaluation;
 - g) rating;
 - h) review;
 - i) data; and
 - j) REACH.
- 10) All electronic communications regarding the December 16, 2010 meeting of District 99 principals.

Please provide all responsive documents to me by April 16, 2013. Do not hesitate to contact me with any questions.

Very truly yours,

GOLAN & CHRISTIE LLP

A handwritten signature in cursive script, appearing to read "Ashley Orler".

Ashley L. Orler

cc: Peter M. Katsaros, Esq.